



June 11, 2019

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Starry, Inc. Notice of Ex-Parte Communication: Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN Docket No. 14-177 and WT Docket No. 10-112; Updating the Commission's Rule for Over-the-Air Reception Devices; WT Docket No. 19-71

Dear Ms. Dortch:

On Friday, June 7, 2019, Starry, Inc., represented by the undersigned and Brian Regan, Vice President, Legal, Policy, and Strategy, participated in a meeting with Aaron Goldberger, Acting Wireless & International Advisor in the Office of Chairman Pai at which the above captioned proceedings were discussed.

During the meeting, Starry reiterated its support for the adoption of final rules for the Lower 37 GHz band that would allow for near-term deployment of innovative commercial and federal technologies and services. Consistent with its previously-filed comments, Starry expressed its support for a simple coordination mechanism in the near-term based on first-in-time rights, with the potential for evolving the sharing mechanism over time to add more dynamic elements as technology and uses cases mature.¹ In addition, Starry reiterated that the sharing framework must include explicit, aggressive, and enforceable construction requirements to ensure that the spectrum in the Lower 37 GHz Band is utilized to the benefit of consumers and federal users, not warehoused and left unused.

Starry also discussed its support for the Commission's adoption of rules to streamline the deployment of fixed wireless base stations by modernizing the over-the-air reception device (OTARD) rule. Consistent with its previously-filed comments, Starry suggested that the Commission's proposed changes to the OTARD rule will significantly streamline the deployment of fixed wireless networks, ultimately improving broadband connectivity in communities across the U.S.² Starry reiterated that modernizing OTARD will also empower property owners to make their property a part of the wireless infrastructure ecosystem while also bringing service to their own property. In addition, Starry reiterated its support for maintaining the existing exception within OTARD for restrictions that are necessary to accomplish a clearly defined, legitimate safety objective, or to preserve prehistoric or historic places.

¹ Comments of Starry, Inc., GN Docket No. 14-177 (filed Sept. 10, 2018).

² Comments of Starry, Inc., WT Docket No. 19-71 (filed June 3, 2019).

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. We have also provided a copy of this letter electronically to all Commission personnel who were in attendance. Please contact the undersigned with any questions.

Respectfully submitted,

Virginia Lam Abrams

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cc: Aaron Goldberger